

13-0759SAG

AFFIDAVIT IN SUPPORT OF SEARCH WARRANT

Your Affiant, Craig Jones, United States Postal Inspector, Linthicum Heights, MD, being duly sworn, hereby deposes and states as follows. The facts contained in this affidavit are based on my personal knowledge as well as that of the other agents involved in this investigation. All observations that were not made personally by me were related to me by persons with knowledge. This affidavit contains that information necessary to establish probable cause to support an application for a search warrant. This affidavit is not intended to include each and every fact and matter observed by or made known to agents of the government.

Your Affiant, Craig Jones, has been a United States Postal Inspector since August 2001 and has completed 12 weeks of basic investigative training, which included the investigation of narcotic related offenses. Your Affiant routinely investigates the use of the U.S. Mail to ship narcotics and narcotics proceeds to and from the Baltimore/Washington area from known narcotic source areas of Florida, Georgia, California, Arizona, Texas and New York (among others). Express Mail and Priority Mail services are regularly used to ship controlled substances and bulk cash through the U.S. Mail.

The United States Postal Service screens inbound Express and Priority Mail packages originating in source states which conform to likely drug profiles. Among the factors we examine are the originating zip code, the weight and characteristics of the package, the amount of postage, whether the address or return address are associated with the names of the sender or recipient, whether the return address is in fact true. When a package is identified as suspect as a result of this initial screening, it is placed with other known packages and subjected to a K-9 sniff.

On April 03, 2013, Express Mail **Parcel EG 978097390 US** ("SUBJECT PARCEL") was retrieved by Postal Inspectors from the Incoming Mail Facility, Linthicum Heights, MD 21090. The SUBJECT PARCEL was addressed to "Scarlett Chang 41904 Corte Santa Barbara Freemont CA 94539-4709" and bore a return address of "Keri Doyle 338 Leyton RD Reisterstown MD 21136." The U.S. Postal Service and law enforcement databases reviewed did reflect an individual by the name of "Scarlett Chang" residing at "41904 Corte Santa Barbara Freemont CA 94539-4709," the address of the SUBJECT PARCEL. In addition, those same databases did reflect an individual by the name of "Keri Doyle" residing at "338 Leyton RD Reisterstown MD 21136," the return address of the SUBECT PARCEL.

On April 03, 2013, Postal Inspectors placed Express Mail **Parcel EG 978097390 US** in an office among other boxes at the Incoming Mail Facility, Linthicum Heights, MD 21090. Maryland State Police K-9 Detective David McCarthy and his narcotic detecting K-9 "Ace" were brought in to search the office. Ace was certified in 2012 to alert on odors of ecstasy (MDMA), cocaine, heroin, black tar heroin, methamphetamine, and marijuana (THC) and is trained on a monthly basis to ensure his accuracy. As of April 8, 2013, Ace had alerted on 200 parcels, 152 of which positively contained narcotics and 32 which positively contained bulk US currency. Detective McCarthy informed Your Affiant that Ace alerted on the SUBJECT PARCEL, which was hidden among other boxes. Postal Inspectors observed the K-9 alert on the parcel.

FILED INDEXED

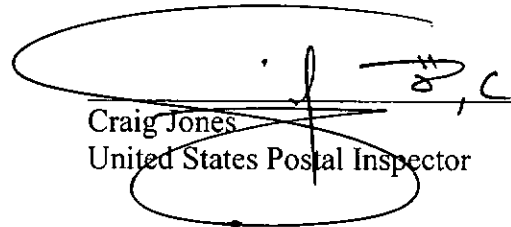
 MAY 02 2013

AT BALTIMORE
 CLERK U.S. DISTRICT COURT
 DISTRICT OF MARYLAND

DMD

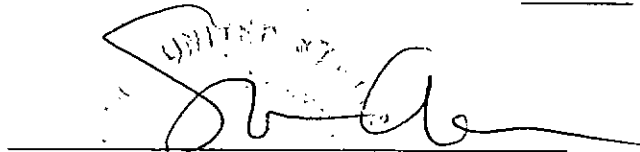
13-0759SAG

It is my belief, based on the information detailed here, that the SUBJECT PARCEL contains a quantity of controlled dangerous substance, or proceeds thereof (i.e. U.S. Currency) constituting contraband or the fruits or instrumentalities of a crime or evidence of the commission of a criminal offense, specifically the unlawful transportation of a controlled substance via the U.S. Mail for the purpose of facilitating possession with intent to distribute the controlled dangerous substance in violation of 21 U.S. Code, Section 843(b), Use of a Communication Facility to Transport Controlled Substances; 18 U.S. Code, Section 1952(a)(1), Use of the Mail with the Intent to Distribute the Proceeds of Any Unlawful Activity; and/or 21 U.S. Code 841(a)(1), Possession with Intent to Distribute a Controlled Substance. This parcel is presently located in the Postal Inspector's office at the Incoming Mail Facility, Linthicum Heights, MD 21090.



Craig Jones
United States Postal Inspector

Subscribed and sworn to before me this 15th day of April 2013 at Baltimore, Maryland



United States Magistrate Judge

Stephanie A. Gallagher
United States Magistrate Judge

dnd